

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**Obj. Deadline: May 3, 2023 at 4:00 p.m. (ET)**

**Hearing Date: May 17, 2023 at 1:00 p.m. (ET)**

**Re: Docket Nos. 1192, 1193 & 1194**

**RE-NOTICE OF MOTION AND HEARING**

**PLEASE TAKE NOTICE** that, on March 29, 2023, Brian C. Simms KC, Kevin G. Cambridge, and Peter Greaves (“**Joint Provisional Liquidators**”), in their capacity as duly appointed joint provisional liquidators of FTX Digital Markets Ltd. (“**FTX Digital**”) and foreign representatives of the Provisional Liquidation of FTX Digital, filed the *Motion of the Joint Provisional Liquidators for a Determination that the U.S. Debtors’ Automatic Stay Does Not Apply to, or in the Alternative for Relief from Stay for Filing of the Application in the Supreme Court of the Commonwealth of the Bahamas Seeking Resolution of Non-US Law and Other Issues* [Docket No. 1192] (the “**Motion**”) and declarations in support thereof [Docket Nos. 1193 & 1194] (the “**Declarations**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”). **You were previously served with copies of the Motion and Declarations.**

---

<sup>1</sup> The last four digits of FTX Trading Ltd.’s tax identification number are 3288. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the debtors (the “**U.S. Debtors**”) and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the U.S. Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the original *Notice of Motion and Hearing* filed with the Motion, (i) a hearing (the “**Hearing**”) with respect to the Motion was originally scheduled for April 12, 2023 at 1:00 p.m. (prevailing Eastern Time) and (ii) the original deadline to file objections or responses, if any, to the Motion was April 5, 2023 at 4:00 p.m. (prevailing Eastern Time) (the “**Objection Deadline**”). The scheduling of the Hearing and the Objection Deadline has been modified as set forth herein.

**PLEASE TAKE FURTHER NOTICE** that the Objection Deadline has been extended, and objections or responses to the relief requested in the Motion, if any, must be made in writing and filed with the Court on or before **May 3, 2023 at 4:00 p.m. (prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE** that the Hearing with respect to the Motion, if required, will now be held before The Honorable John T. Dorsey, United States Bankruptcy Judge for the District of Delaware, at the Court, 824 North Market Street, 5th Floor, Courtroom 5, Wilmington, Delaware 19801, on **May 17, 2023 at 1:00 p.m. (prevailing Eastern Time)**.

**PLEASE TAKE FURTHER NOTICE THAT, IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED IN ACCORDANCE WITH *THIS NOTICE*, THEN THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.**

Dated: April 3, 2023

/s/ Brendan J. Schlauch

**RICHARDS, LAYTON & FINGER, P.A.**

Kevin Gross (No. 209)  
Paul N. Heath (Bar No. 3704)  
Brendan J. Schlauch (Bar No. 6115)  
David T. Queroli (Bar No. 6318)  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701  
gross@rlf.com  
heath@rlf.com  
schlauch@rlf.com  
queroli@rlf.com

—and—

**WHITE & CASE LLP**

Jessica C. Lauria (admitted *pro hac vice*)  
J. Christopher Shore (admitted *pro hac vice*)  
Brian D. Pfeiffer (admitted *pro hac vice*)  
Mark Franke (admitted *pro hac vice*)  
Brett L. Bakemeyer (admitted *pro hac vice*)  
1221 Avenue of the Americas  
New York, NY 10020  
Telephone: (212) 819-8200  
jessica.lauria@whitecase.com  
cshore@whitecase.com  
brian.pfeiffer@whitecase.com  
mark.franke@whitecase.com  
brett.bakemeyer@whitecase.com

Thomas E Lauria (admitted *pro hac vice*)  
Richard S. Kebrdle (admitted *pro hac vice*)  
200 South Biscayne Boulevard, Suite 4900  
Miami, FL 33131  
Telephone: (305) 371-2700  
tlauria@whitecase.com  
rkebrdle@whitecase.com

*Attorneys for the Joint Provisional  
Liquidators of FTX Digital Markets Ltd. (In  
Provisional Liquidation)*